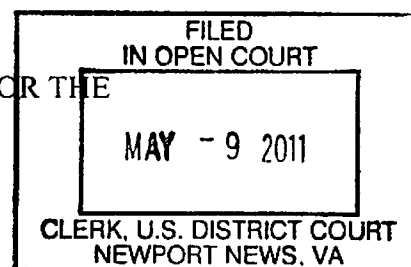


IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Newport News Division



UNITED STATES OF AMERICA

v.

DION BARTLETT,

Defendant.

CRIMINAL NO. 4:11CR 35

21 U.S.C. § 846

Conspiracy to Possess with Intent to
Distribute Cocaine and Cocaine Base
(Count 1)

21 U.S.C. § 841

Possess with Intent to Distribute Cocaine
(Count Two)

21 U.S.C. § 841

Possess with Intent to Distribute
Cocaine Base
(Count Three)

21 U.S.C. § 841

Distribute Cocaine Base
(Count Four)

21 U.S.C. §853

Forfeiture Allegation

INDICTMENT

May 2011 Term - At Newport News, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

In or about 2011, in the Eastern District of Virginia and elsewhere, the defendant, DION BARTLETT did unlawfully, knowingly and intentionally combine, conspire, confederate and agree together with other persons known and unknown to the grand jury to commit the following offenses against the United States:

1. Distribute a mixture or substance containing a detectable amount of cocaine hydrochloride (hereinafter referred to as "cocaine"), a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).
2. Possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).
3. Distribute a mixture or substance containing a detectable amount of cocaine base, commonly known as "crack" (hereinafter referred to as cocaine base), a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).
4. Possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine, commonly known as "crack", a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

(All in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(C)).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 27, 2011, in Williamsburg, Virginia, within the Eastern District of Virginia, the defendant, DION BARTLETT, did unlawfully, knowingly and intentionally possess with intent to distribute a mixture and substance containing cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Section 841).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 27, 2011, in Williamsburg, Virginia, within the Eastern District of Virginia, the defendant, DION BARTLETT, did unlawfully, knowingly and intentionally possess with intent to distribute a mixture and substance containing cocaine base, also known as "crack", a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Section 841).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 14, 2011, in Williamsburg, Virginia, within the Eastern District of Virginia, the defendant, DION BARTLETT, did unlawfully, knowingly and intentionally distribute a mixture and substance containing cocaine base, also known as "crack", a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Section 841).

FORFEITURE ALLEGATION

THE GRAND JURY FURTHER CHARGES THAT:

A. The defendant, DION BARTLETT, if convicted of the violation alleged in Counts One through Four of the indictment, shall forfeit to the United States:

1. Any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of such violation; and
2. Any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.
3. If any property that is subject to forfeiture above, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third person, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be subdivided without difficulty; it is the intent of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).

(In violation of Title 21, United States Code, Section 853.)

UNITED STATES V. DION BARTLETT, 4:11CR 35

Pursuant to the E-Government Act,
the original of this page has been filed
electronically in the Clerk's Office.

A TRUE BILL:

FOREPERSON

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UNITED STATES ATTORNEY

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